# Exhibits A-C to Letter of September 7, 2005 from Seth D. Rigrodsky to the Court

## Exhibit A

#### ROSENTHAL, MONHAIT, GROSS & GODDESS, P. A.

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JOSEPH A. ROSENTHAL NORMAN M. MONHAIT KEVIN GROSS JEFFREY S. GODDESS CARMELLA P. KEENER EDWARD B. ROSENTHAL

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September 7, 2005

## VIA HAND DELIVERY AND ELECTRONIC FILING

The Honorable Kent A. Jordan
United States District Court, District of Delaware
844 N. King Street
Lock Box 10
Wilmington, DE 19801

Re: Drywall Acoustic Lathing and Insulation Local 675 Pension Fund v.
Molson Coors Brewing Company, D. Del., C.A. No. 05-cv-00294-KAJ

Brent W. Klos, v. Molson Coors Brewing Company, et al.,

D. Del., C.A. No. 05-cv-00317-KAJ

David Silver v. Molson Coors Brewing Company, et al., D. Del., C.A. No. 05-cv-00324-KAJ

#### Dear Judge Jordan:

I am writing regarding the hearing scheduled for Wednesday, October 5, 2005 on the lead plaintiff/lead counsel motions presently pending before the Court.

I called Your Honor's office last Friday to seek a continuance because October 5 presents conflicts for my co-counsel who observe Rosh Hashanah, a very important Jewish holiday. At that time, Your Honor's assistant suggested that I seek the agreement of all counsel to adjourn the hearing to October 28, 2005 at 9:00 a.m., which was the Court's next available hearing time. I regret to inform the Court that counsel for "the Molson Coors Investors Group" are not willing to accede to the rescheduling. Defendants' counsel and all others who intend to participate have indicated that the October 28 date is satisfactory.

Honorable Kent A. Jordan September 7, 2005 Page 2

My co-counsel and I will make ourselves available at whatever time Your Honor sets for the hearing. We await Your Honor's guidance as to whether the hearing will go forward on October 5, as presently scheduled, or will be rescheduled to October 28, 2005 at 9:00 a.m.

Respectfully,

/s/ Carmella P. Keener

Carmella P. Keener (DSBA No. 2810)

CPK/jls

cc: All Counsel on attached service list (via electronic delivery, as indicated)

#### CERTIFICATE OF SERVICE

I, Carmella P. Keener, hereby certify that on this 7th day of September, 2005, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

John D. Hendershot, Esquire Richards, Layton & Finger One Rodney Square P.O. Box 551 Wilmington, DE 19899

Seth D. Rigrodsky, Esquire Ralph D. Sianni, Esquire Brian D. Long, Esquire Milberg Weiss Bershad & Schulman LLP 919 N. Market Street, Suite 441 Wilmington, DE 19801

Paul A. Fioravanti, Jr., Esquire Prickett, Jones & Elliott, P.A. 1301 King Street, P.O. Box 1328 Wilmington, DE 19899

In addition, the undersigned counsel has caused copies of the foregoing documents to be electronically sent to the following:

Charles J. Piven, Esquire Law Offices of Charles J. Piven, P.A. The World Trade Center-Baltimore 401 E. Pratt Street, Suite 2525 Baltimore, MD 21202

Elise J. Cohen, Esquire Lerach Coughlin Stoia Geller Rudman & Robbins LLP 9601 Wilshire Blvd., Suite 510 Los Angeles, CA 90210 Michael A. Swik, Esquire Law Offices of Michael A. Swick, PLLC One Williams Street, Suite 900 New York, NY 10004

William S. Lerach, Esquire
Darren J. Robbins, Esquire
Laura M. Andracchio, Esquire
Lerach Coughlin Stoia Geller Rudman
& Robbins LLP
401 B Street, Suite 1600
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One Pennsylvania Plaza
New York, NY 10119

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Marc A. Topaz, Esquire Richard A. Miniskas, Esquire Tamara Skvirsky, Esquire Schiffrin & Barroway, LLP 280 King of Prussia Road Radnor, PA 19087

Stephen A. Weiss, Esquire Eric T. Chaffin, Esquire Seeger Weiss LLP 1 William Street New York, NY 10014-2502

/s/ Carmella P. Keener

Carmella P. Keener (DSBA No. 2810)
Rosenthal, Monhait, Gross & Goddess, P.A.
919 N. Market Street, Suite 1401
Wilmington, DE 19801
(302) 656-4433
ckeener@rmgglaw.com

# Exhibit B

#### Rigrodsky, Seth

From: Sent: Darren Robbins [darrenr@lerachlaw.com] Saturday, September 03, 2005 2:40 AM

To: Cc: Rigrodsky, Seth Elise Cohen

Subject:

**RE: Molson Coors** 

you are most welcome for our cooperation

Are you sure all the firms are substantial and how do we know which lawyers will be "not impacted by the holiday?"

>>> "Rigrodsky, Seth" <SRigrodsky@milbergweiss.com> 09/02 12:47 PM >>> While not insensitive to your request, the firms involved are very substantial and I believe lawyers not impacted by the holiday can appear and argue on October 5th. A three-four week delay of the proceedings to resolve a motion of extremely questionable merit is not in the best interests of the class. Please contact me before filing a motion with the Court and let me know which of the movants' counsel are not available on the 5th, and why no other counsel are available. Thank you for your cooperation.

----Original Message----

From: Jody Shipley [mailto:JShipley@rmgglaw.com] On Behalf Of Carmella Keener

Sent: Friday, September 02, 2005 3:27 PM

To: hendershot@rlf.com; Rigrodsky, Seth; Sianni, Ralph; Long, Brian; pafioravanti@prickett.com; hoffman@pivenlaw.com; elisec@lerachlaw.com; wsl@lerachlaw.com; darrenr@lerachlaw.com; Schulman, Steven; Seidman, Peter; Rado, Andrei; ebelfi@murrayfrank.com; mtopaz@sbclasslaw.com; rmaniskas@sbclasslaw.com; tskvirsky@sbclasslaw.com; Weiss, Stephen; echaffin@seegerweiss.com; mxs666@att.net; kellyb@lerachlaw.com

Cc: Carmella Keener Subject: Molson Coors Importance: High

Because of Rosh Hashanah, we were going to make a motion to continue the October 5, 2005 hearing, but I was advised by Cheryl of Judge Jordan's chambers that I should, instead, contact all counsel to seek agreement that October 28 at 9:00 a.m. is satisfactory to all parties for the hearing to be rescheduled.

Please respond to this email as promptly as possible, as Judge Jordan's assistant would like to get this matter on the calendar.

CARMELLA P. KEENER, ESQUIRE ROSENTHAL, MONHAIT, GROSS & GODDESS, P.A. SUITE 1401, 919 N. MARKET STREET WILMINGTON, DE 19801

PHONE: (302) 656-4433 EMAIL: ckeener@rmgglaw.com

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# Exhibit C

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### Rigrodsky, Seth

Hendershot, John [Hendershot@RLF.com] From:

Tuesday, September 06, 2005 9:46 AM Sent:

Carmella Keener; Rigrodsky, Seth; Sianni, Ralph; Long, Brian; pafioravanti@prickett.com; To:

hoffman@pivenlaw.com; elisec@lerachlaw.com; wsl@lerachlaw.com; darrenr@lerachlaw.com;

Schulman, Steven; Seidman, Peter; Rado, Andrei; ebelfi@murrayfrank.com; mtopaz@sbclasslaw.com; rmaniskas@sbclasslaw.com; tskvirsky@sbclasslaw.com; Weiss,

Stephen; echaffin@seegerweiss.com; mxs666@att.net; kellyb@lerachlaw.com

Subject: RE: Molson Coors

Carmella, et al.,

Defendants' counsel can attend on either October 5 or October 28.

Regards, John Hendershot

Richards, Layton and Finger, P.A. is not providing any advice with respect to any federal tax issue in connection with this matter.

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From: Jody Shipley [mailto:JShipley@rmgglaw.com] On Behalf Of Carmella Keener

Sent: Friday, September 02, 2005 3:27 PM

To: Hendershot, John; Seth Rigrodsky Esquire (E-mail); Ralph Sianni Esquire (E-mail); blong@milbergweiss.com; pafioravanti@prickett.com; hoffman@pivenlaw.com; elisec@lerachlaw.com; wsl@lerachlaw.com; darrenr@lerachlaw.com; sschulman@milbergweiss.com; pseidman@milbergweiss.com; arado@milbergweiss.com; ebelfi@murrayfrank.com; mtopaz@sbclasslaw.com; rmaniskas@sbclasslaw.com; tskvirsky@sbclasslaw.com; sweiss@seegerweiss.com; echaffin@seegerweiss.com; mxs666@att.net; kellyb@lerachlaw.com

Cc: Carmella Keener Subject: Molson Coors Importance: High

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Please respond to this email as promptly as possible, as Judge Jordan's assistant would like to get this matter on the calendar.

CARMELLA P. KEENER, ESQUIRE ROSENTHAL, MONHAIT, GROSS & GODDESS, P.A.